



STATE OF UTAH
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF SOLID AND HAZARDOUS WASTE
P.O. Box 144880, Salt Lake City, Utah 84114-4880
(801) 538-6170

HAND DELIVERED

MAR 2 2004
04.00980

Utah Division of Solid
and Hazardous Waste

IMPORTANT! Before filling out this form, please read all instructions on back.

PERMIT APPLICATION FOR USED OIL TRANSFER FACILITY	
1. Company Name <u>Emerald Services</u>	2. Owner <u>J. Stephan Banchemo Jr.</u>
3. Name of Contact Person <u>Jim Munnell</u>	4. Telephone Number <u>206-832-3032</u>
5. Mailing Address <u>9010 E. Marginal Way S</u> <u>Suite 200</u> <u>Seattle, WA 98108</u>	6. \$100 Permit Fee Paid Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7. Facility Address <u>650 West 500 South</u> <u>Salt Lake City, UT 84104</u>	\$50 Handler Certificate Fee Paid Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8. EPA ID Number	9. Permit Number (State Use Only)

10. Methods to be used for collecting, storing, and delivering used oil:

See attached documents

11. Methods of disposing of any waste by-products:

See attached documents

R315-15-13.4 requires that the following information also be included with the permit application:

- A. Map of transfer facility.
- B. Type of containment and volume, including type and number of storage vessels to be used.
- C. Status of business, zoning, and other applicable licenses and permits if required by federal, state and local government entities.
- D. An emergency spill containment plan.
- E. Proof of liability insurance or other means of financial responsibility for liabilities that may be incurred in collecting and transporting used oil.
- F. Proof of and amount of reclamation surety for any facility used in the storage of used oil.
- G. A closure plan meeting the requirements of R315-15-11.
- H. Rebuttable presumption for used oil procedures as required in R315-15-4.5.

I hereby certify that the foregoing is true and correct

Name Stacy Fox Title Environmental Coordinator
Signature [Signature] Date 12-29-03

PERMIT APPLICATION FOR USED OIL TRANSFER FACILITY (Con't)

Permittee: Emerald Services, Inc.

10. Methods to be used for collecting, storing and delivering used oil.

Used oil will be collected from used oil generators within the state of Utah and outside the state of Utah. All used oil will be collected according to Emerald's Used Oil Transporter Permit UOP-084-02.

All used oil will be stored for a period of less than 35 days, and transported by rail or truck to an out-of-state permitted recycler/re-refiner.

All used oil will be transported as off-specification used oil on a standard bill-of-lading to a location for treatment and recycling outside the state of Utah.

11. Methods for disposing of by-products.

Emerald Services will transport all material out of the state of Utah. In the event petroleum-contaminated materials are generated within Utah during Emerald's transportation activities, the material will be properly and fully designated according to Federal and State regulations. Non-hazardous petroleum-contaminated material will be managed at Emerald Services – Seattle, WA facility. Any hazardous waste that may be generated would be manifested to a RCRA-permitted TSD for disposal.

A. Map of Transfer Facility. Area street map and site map attached.

B. Type of Containment and volume and # of storage vessels

Emerald Services Inc will be utilizing a rail car for temporary storage of used oil. The rail car is 68' in length and has a total storage capacity of 198,500 lbs by weight or 26,500 gallons of used oil by volume. Total secondary containment during transferring will be 1155 gallons. See secondary containment design data below for specifications.

Emerald will also store non-bulk containers of used oil inside the transfer facility trailer (example: 48' box trailer) that will be used for temporary storage and then used to transport the used oil out-of-state for recycling. All containers of used oil will be stored in secondary containment. There will be no opening of containers or transferring from non-bulk containers except during emergency situations. Total secondary containment will always be at least 100% of largest container.

Secondary Containment Design Data

Secondary Containment Area	Area (ft ²)	Dimensions	Volume (gal)
Load /Unload Area (Total Area)	825.5		5194
A. Railcar Area	121.5	13.5' x 9' x 6"	168
B. Railcar Supplemental Containment Area	64	8' x 8' x 6"	239
C. Tank Truck Containment	100	10' x 10' x 1'	748
D. Box Van Containment	540	54' x 10' x 1'	4039

- A. Ultra-track pans w/ Grates and Covers – See attached specification sheets. The complete secondary containment area will include 3 connected sets of 2 side trackpans and 1 center pan for a total length of 13.4' and total width of 9'.
- B. A steel pan will be used in the area between the side track pan and the tank truck secondary containment.
- C. Truck secondary containment will include the complete rear-end of truck including all fittings and hose.
- D. Secondary Containment for box van will consist of either of the following types of spill containment:
 - 1. Individual pallet type secondary containment that will have a capacity of at least 100% of the largest container and the drums will be stored inside the box van on the secondary containment pallets.
 - 2. Secondary spill containment that is designed to be driven onto. This type of secondary containment has walls that are collapsible when empty or when the truck is driving over the wall.

Also see attached Railcar Loading Procedure and Transfer Facility Procedures

- C. **Zoning for this area:** M-1 Light Manufacturing
- D. **Emergency Spill Containment Plan.** See attached document (Contingency Plan)
- E. **Certificate of Liability Insurance** Original already on file.
- F. **Proof of and amount of reclamation surety** - Letter of Credit – will be sent
- G. **Closure Plan** - See attached document
- H. **Rebuttable Presumption for Used Oil as required R315-15-4.5.**

Attached documents: Used Oil Halogen screening and Profile Verification Testing Procedures.

ACORD

CERTIFICATE OF LIABILITY INSURANCE

OP ID JM
EMESE-1

DATE (MM/DD/YY)

01/15/04

PRODUCER

Hall-Conway-Jackson, Inc.
P.O. Box 8010
Mill Creek WA 98082-8010
Phone: 425-368-1200 Fax: 425-368-1290

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURERS AFFORDING COVERAGE

INSURED

Emerald Petroleum Services Inc
9010 East Marginal Way S. #200
Seattle, WA 98108

INSURER A: **Greenwich Ins Co**
INSURER B: **Ins Co of the St. of Pennsylv**
INSURER C: **Commerce & Industry Ins. Co.**
INSURER D:
INSURER E:

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY	GEC0000653-04	01/15/04	01/15/05	EACH OCCURRENCE \$ 1,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				FIRE DAMAGE (Any one fire) \$ 100,000
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				MED EXP (Any one person) \$ 5,000
	<input checked="" type="checkbox"/> \$5,000 Deductible				PERSONAL & ADV INJURY \$ 1,000,000
					GENERAL AGGREGATE \$ 2,000,000
					PRODUCTS - COMP/OP AGG \$ 2,000,000
A	AUTOMOBILE LIABILITY	AEC0000654-04	01/15/04	01/15/05	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000
	<input checked="" type="checkbox"/> ANY AUTO				BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (Per accident) \$
	<input type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident) \$
	<input checked="" type="checkbox"/> HIRED AUTOS				
	<input checked="" type="checkbox"/> NON-OWNED AUTOS				
B	GARAGE LIABILITY	4 3048442	01/15/04	01/15/05	AUTO ONLY - EA ACCIDENT \$
	<input type="checkbox"/> ANY AUTO				OTHER THAN EA ACC \$
					AUTO ONLY: AGG \$
	EXCESS LIABILITY				EACH OCCURRENCE \$ 5,000,000
	<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE \$ 5,000,000
	<input type="checkbox"/> DEDUCTIBLE				\$
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	WC 5841547 WORKERS COMP POLICY INCLUDES USL&H	10/31/03	10/31/04	<input checked="" type="checkbox"/> WC STATU- TORY LIMITS <input type="checkbox"/> OTH- ER
					E.L. EACH ACCIDENT \$ 1,000,000
					E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
					E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	OTHER	PEC0000655-04	01/15/04	01/15/05	\$5,000,000
	Contractors Pollution				\$25,000 SIR

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

Bid Purposes only

CERTIFICATE HOLDER

N

ADDITIONAL INSURED; INSURER LETTER:

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Thomas F. Jackson



700 West

700 South

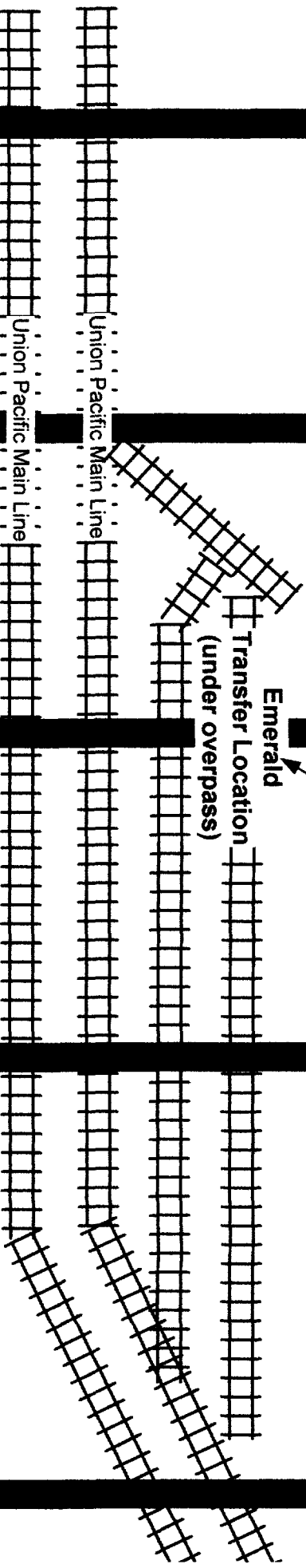
600 South

500 South

400 South

300 South

600 West



Not to Scale

PROFILE VERIFICATION TESTING PROCEDURE

1.0 Subject: Profile Verification

2.0 Group(s) Affected: All Drivers

3.0 Effective Date: 04/01/02

3.1 Revision Date: 11/26/02
04/23/03

4.0 Policy:

The following outlines the procedures to be followed for removing of non-hazardous waste from a generator site for treatment.

4.1 Review generator information as listed on Bill of Lading

A. The following must be complete before any load is accepted:

- A complete customer address and phone number.
- Reference to an approved profile number (i.e. used oil = profile # G00505)
- Match the description on the bill of lading with the generic profile.
- Customer signature of the non-hazardous waste certification, if material passes pre-screening.

B. Secure a representative sample of the tank or container of waste that is being removed.

Perform the following tests determined by the wastestream

1. Perform the following test before loading the truck:

- a. Wastestreams of oil, oily water, oily bilge water, oily tank cleaning water:
 - Chlor-d-tect (Attachment 1) or TIF XP 1-A Halogen Hawk
 - Document results on the Bill of Lading
 - Visual-physical observation (i.e., color, oil, solvent odor)

For containerized material a representative composite sample from all drums must be pulled and verified. One composite sample shall consist of no more than 10 drums.

C. All loads that do not match the profile by failure of one or more tests will not be loaded. The generator and supervisor must be contacted.

ATTACHMENT 1
Chlor-d-tect Instructions

INSTRUCTIONS FOR **CLOR-D-TECT® 1000**

Used Oil Screening Kit

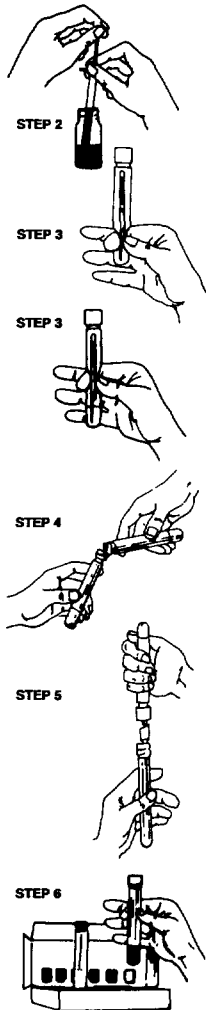
Test kit for chlorine contamination in used oil.

EACH KIT CONTAINS:

1. Tube #1 - A plastic test tube with white dispensing cap containing a colorless ampule (bottom) and a yellow-dotted, gray ampule (top).
2. Tube #2 - A plastic test tube with yellow cap containing 7 ml of a buffer solution, a yellow-dotted ampule (bottom), and a red-green ampule (top).
3. A 1 ml polypropylene sampling syringe and a tissue wipe.
4. A plastic filtration funnel.
5. A glass ampule contained in a cardboard sleeve and plastic tube designated as "Disposal Ampule".

READ CAUTION AND INFORMATION SECTIONS ON BACK BEFORE PERFORMING TEST. WEAR RUBBER GLOVES AND SAFETY GLASSES.

DIRECTIONS



1. **PREPARATION** Remove contents from box. Place the 2 plastic tubes into the holder at the front of the box.

2. **SAMPLE INTRODUCTION** Unscrew the white dispenser cap from Tube #1. Work the plunger on the empty sampling syringe a few times to ensure that it slides easily. Place the tip of the syringe into the oil sample to be tested and slowly pull back on the plunger until it reaches the stop and cannot be pulled further. Remove the syringe from the oil sample and wipe any excess oil from the outside of the syringe with the enclosed tissue. Place the tip of the syringe in Tube #1 and dispense the oil sample by depressing the plunger. Replace the white cap on the tube.

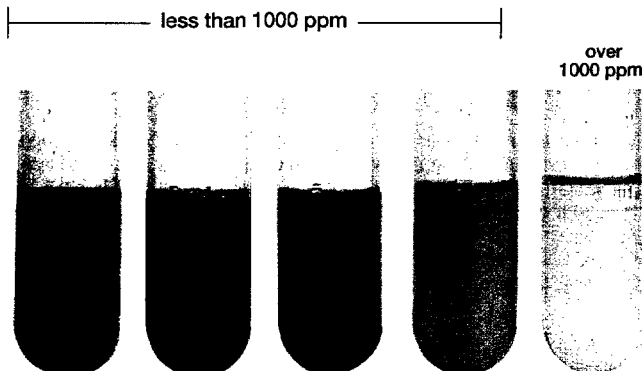
3. **REACTION** Break the bottom (colorless) ampule in the tube by compressing the sides of the tube. Mix thoroughly by shaking the tube vigorously for about 30 seconds. Break the top (gray) ampule in the tube and shake thoroughly for about 20 seconds. Allow the reaction to proceed for an additional 40 seconds (total of one minute), while shaking intermittently several times.

4. **EXTRACTION** Remove the caps from both tubes and pour the clear buffer solution from Tube #2 (yellow cap) into Tube #1. Replace the white cap tightly on Tube #1 and shake vigorously for 10 seconds. Vent the tube by partially unscrewing the dispenser cap. Close securely and shake well for an additional 10 seconds. Vent again, tighten cap, and stand tube upside down on its cap. Allow the phases to separate for a full two minutes.

5. **ANALYSIS** Place the plastic filtration funnel into Tube #2. Position Tube #1 over funnel and open nozzle on dispenser cap. Dispense 5 mls of the clear solution through the filter into Tube #2 (up to the line) by squeezing the sides of Tube #1. Close the nozzle on the dispenser cap on Tube #1 and remove the filter funnel from Tube #2. Replace the yellow cap on Tube #2 and break the bottom (colorless) ampule and shake for 10 seconds. Break the top (colored) ampule and shake for 10 seconds.

6. **RESULTS** Observe the resultant color immediately and compare to the color chart below for chlorine determination.

7. **DISPOSAL** Open the disposal ampule container and drop the ampule into Tube #2. Replace the cap on the test tube. Crush the ampule by squeezing the sides of the tube. Shake for 5 seconds. This reagent immobilizes the mercury so that the kit passes the EPA's TCLP test. See caution section on back for additional information on disposal.



DEXSIL®

CLOR-D-TECT 1000 IS A TRADEMARK OF THE DEXSIL CORPORATION AND IS COVERED UNDER U.S. PATENT 5,013,667.

Used Oil Halogen Screening - Bulk or Drums

- Used oil is defined as: oil that is refined from crude oil, used, and as a result of such use is contaminated by physical or chemical impurities which resulted only from processes which can be attributed to used oil operations. In addition, the oil has not been mixed with any hazardous or dangerous waste regulated under, 40 CFR 279, 40 CFR Part 261 or 40 CFR Part 761 except for Conditionally Exempt Small Quantity Generator (CESQG).
- Used oil can be collected in bulk or drums. Normally a used oil collection truck will service all bulk accounts and most drum accounts. Otherwise, all drums of used oil are collected by a package truck.
- All used oil must be tested for halogenated organic compounds (HOC's) prior to transport under R315-15-4.5. The permitted level of HOC's is < 1000ppm. The following is Emerald's procedure on testing used oil in the field.

Field-testing equipment:

- (1) Chlor-D-Tect 1000 or TIF XP-1A Halogen Hawk

Application: All bulk and drum collection

Customers: All Customers every service

- Managing of Used Oil with concentrations >1000 ppm HOC's: Any used oil with >1000 ppm total HOC's managed from a Conditionally Exempt Small Quantity Generator can be managed as Used Oil and will be managed in non-bulk containers. This material will be managed at an approved recycling or disposal facility.

3.13.3 RAILCAR LOADING PROCEDURES

1.0 Subject: Emerald policy of loading railcars from

2.0 Group(s) Affected: Operations Personnel

3.0 Effective Date: 06/06/02

3.1 Revision Date: 11/15/02
03/24/03

4.0 Policy

The following procedure is designed to ensure that all railcars containing used oil are loaded safely and in compliance with applicable regulations.

4.1 Procedure

1. Prior to railcar loading, fill out Railcar Used Oil Transfer Log. If the railcar is full and ready for transport, a bill-of-lading must be prepared for the outbound shipment. The description must agree with a generic profile used by the receiving facility.
2. Prior to shipment of a full railcar, a 4-oz representative sample must be taken and sent to Seattle lab for the following analysis.
 - a) PCB's
 - b) HOC's
 - c) Flashpoint
3. Personnel performing loading must wear coveralls, hardhat, steel-toed boots, protective gloves, and safety glasses.
4. Ensure spill response equipment is accessible. Cover all storm drains with impermeable cover to prevent access to drain.
5. Position the tank truck next to the railcar spur.
6. Place safety signs at the head of the rail spur ("Men Working") warning the railroad not to connect or relocate.
7. Chalk all wheels to prevent accidental movement.
8. Secure a grounding strap from vacuum truck to railcar.
9. Secure the area with caution control cones and taping.

10. Place secondary containment under the valves on the back end of the tank truck.
11. Place a drip pan under the hose connections that are not over secondary containment.
12. Ensure the hose is compatible with the waste being loaded and that it is tested to withstand up to 150 psi. Check the camlock gaskets for integrity and tape or wire down all connections.
13. Uncover the rail track secondary containment pans.
14. Insure that the rail track secondary containment pans are free of debris and liquid.
If not, the pans must be pumped prior to use.
15. Take a beginning reading on the truck and railcar to ensure there is enough space available for transfer.
16. Perform a visual inspection of tank contents prior to loading to ensure contents match description on bill-of-lading.
17. Two people with knowledge of loading and off-loading procedures must be present during loading. If, at any time, one of the people must leave the operation, the operation must be stopped until a second qualified person is available. At least one person shall be an Emerald Services, Inc. employee.
18. If loading from the top hatch, one person must remain on top of the railcar and one person must remain at the tank truck connection at all times during transfer.
19. Only permitted Emerald Services, Inc. tanker trucks shall be allowed to make any transfers.

4.2 Post Loading

1. Clear the hose of any material.
2. Cap and plug all hoses to prevent drips.
3. Close all internal valves on the rail car.
4. Close and secure the railcar hatch.
5. Secure bottom cap.

6. If loading, place proper placard on railcar as necessary.
7. Clear area of all safety equipment prior to departing loading site.

Railcar Loading Log – Used Oil Only

[illegible]

3.7.6 CONTINGENCY PLAN AND SPILL REPORTING POLICY FOR UTAH OPERATIONS

1.0 Subject: Contingency Plan and Spill Reporting Procedures

2.0 Group(s) Affected: All Emerald Services Personnel

3.0 Effective Date: 11/22/02

3.1 Revision Date: 11/26/02
03/24/03
12/29/03
2/27/03

4.0 Policy

1. All spills at the facility or off-site must be reported to designated spill response supervisory personnel (Emergency Coordinators) immediately after spill has been stabilized. Emergency Coordinators must gather all information as required in part 4.1.2 of this Section. Emergency Coordinators will then immediately report all information to the Environmental, Health and Safety(E,H,&S) Department (See notification call list). The E,H&S department, if required by R315-15-9(b) will notify Utah State Department of Environmental Quality as stated in 4.1.3 of this Section.

Caution: No spill should be considered too small to report to supervisory personnel. Any spill of one (1) gallon or greater on facility premises must be reported. Any quantity regardless of size must be reported if it occurs off facility property.

2. To comply with regulatory requirements, the following information must be reported by the responsible parties who were involved with the spill:
 - a. Type of chemical
 - b. Location, Date, Time and Quantity
 - c. Persons at scene
 - d. Cause of Release
 - e. Clean-up measures in process or concluded
 - f. Bill of Lading/Shipping paper information
 - g. Injuries, if any
 - h. Public health and environmental impact
3. Responsible personnel must fill out report forms and forward the form to your Supervisor by the end of the shift.
4. A meeting must be arranged within 24 hrs between the supervisor, the responsible party and a member of the E,H & S department to discuss the incident.

Without this basic information, Environmental Staff cannot properly and completely meet reporting requirements to regulatory agencies under RCRA, DOT, HMTA, WAC, TSCA, OSHA, CERCLA/SARA, CWA, or CAA.

4.1 Response Procedure

4.1.1 Immediate action for responsible on-scene personnel

In the event of a release of used oil, the person responsible for the material at the time of release shall immediately:

1. Notify law enforcement officials, fire officials, and summon medical assistance as necessary by dialing 911 from any phone.
2. If you must leave the scene to make calls, return to the scene as quickly as possible. Keep the Bill of Lading on your person and ensure that you are readily available to fire and law enforcement officials upon their arrival. If danger to the public exists, remain at the scene and request that another party make the necessary calls.
3. Render first aid or medical assistance to yourself or others as necessary.
4. Safeguard yourself and others. Everyone must be clear of the area, with the exception of law enforcement officials. Assist law enforcement and fire officials if requested.
5. Take appropriate action to minimize the treat to human health and the environment. Set up controls to minimize and prevent further incidents. If it is possible to accomplish without risk, stop the leak to reduce clean-up measures (use rags, extra clothing, etc.)
6. Use sand, dirt, or other material in the vicinity to restrict the contaminated spill area or dig a drainage trench to contain the spilled material.
7. Remain at the scene and remain available until the emergency is declared “over” and you are release by both law enforcement and fire officials.

4.1.2 Immediate action by Emergency Coordinators

1. Emergency Coordinators must immediately gather the following information from the responsible on-scene person.
 - a. Name, phone and address of person responsible for release
 - b. Name, title and phone number of person reporting release.
 - c. Time and date of release
 - d. Location of release—as specific as possible including the nearest town, city, highway or waterway.
 - e. Description contained on the manifest and the amount of material released
 - f. Cause of release
 - g. Possible hazards to human health or the environment and emergency action taken to minimize threat.
 - h. The extent of injuries, if any.
2. Immediately report all information to E,H&S Department.

4.1.3 Immediate action by the Environmental, Health and Safety Department

The E,H&S department will then contact the necessary governmental agencies to fulfill regulatory reporting requirements and ensure that all action requested by regulatory agencies must be performed as soon as possible.

1. The E,H&S Department will notify the Utah State Department of Environmental Quality, 24-hr answering services, **801-536-4123** for used oil releases exceeding 25 – gallons, or from smaller releases that pose a potential threat to human health or the environment including but not limited to: spills nearby or into surface water, storm or sewer systems. Small leaks and drips from vehicles are considered de minimis and are not subject to the release clean-up provisions of R315-15-9.
2. Emerald Services E,H&S personnel will provide the following information when reporting the release:

- a. Name, phone and address of person responsible for release.
 - b. Name, title and phone number of person reporting release.
 - c. Time and date of release.
 - d. Location of release—as specific as possible including the nearest town, city, highway or waterway.
 - e. Description contained on the manifest and the amount of material released.
 - f. Cause of release.
 - g. Possible hazards to human health or the environment and emergency action taken to minimize threat.
 - h. The extent of injuries, if any.
3. If Emerald Services, Inc. has discharged used oil they shall:
 - a. Give notice, if required by 49 CFR 171.15 to the National Response Center, 1-800-424-8802 or 202-426-2675 and
 - b. Report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590
4. Any amount of used oil or hazardous substances discharged to navigable waters will be reported as required in 33 CFR 153.203.
5. In the event of an extreme emergency for example: large fire, major spill, spill to surface water, major traffic accident, the E, H & S department must contact a Qualified individual.

4.2 Release Clean-up Procedures

Emerald Services shall clean-up all released material and any residue or contaminated soil, water or other material resulting from the release or take all actions as may be required by the Executive Secretary so that the released material no longer poses a hazard to human health or the environment. The cleanup or other required actions shall be at Emerald's expense.

4.3 Spill Kits

All trucks are equipped with spill kits containing the following items.

POPUP POOL (66 gallon capacity)

WSO-30 OIL ONLY SOCKS (3 inches wide by 12 feet long)
DISPOSAL BAG
REPAIR PUTTY STICK
RUBBER GLOVES

Drivers are required to notify supervisor or truck shop if they need replacement stock for the spill kits. Spill kits are mounted on the exterior of the truck.

4.4 Earthquake Response Procedure

1. Immediately shut down transferring operations.
2. Evacuate to an area away from drums or other objects that could fall from over head.
3. After quake has ended, contact Emergency Coordinator and if necessary contact local authorities, and render first-aid if necessary.
4. If area is safe to re-enter, perform inspection of critical inspection points. (Attachment 2)
5. If spills have occurred follow spill response procedure as outlined in part 4.2 of this section.

4.5 Emergency Notification Call List

Notification to supervisory personnel, of a spill or fire must be done as soon as safely possible. The responsible party is to contact their respective Emergency Coordinator and the Emergency Coordinator is to contact at least one member of the Environmental Health and Safety Department.

EMERGENCY COORDINATORS:

Utah Area - Transportation Division

Emergency Coordinator

Napo Jemmings, Manager (801) 592-5319

Alternates

Brenda Jemmings (801) 592-5317

Robert Montoya (801) 973-4131

Dave Sherrill (801) 973-4131

Out of State, Alternate

Jim Munnell (206) 832-3032 Cell Phone: (206) 963-0370

ENVIRONMENTAL HEALTH AND SAFETY DEPARTMENT

The Emergency Coordinator must contact one of the following individuals. Do not just leave a voicemail, you must try the next person on the list until some one is reached directly.

Sheila Smith	(253) 370-7912 Cell Phone:(253) 370-7912
Kristi Whitney	(206) 832-3205 Cell Phone:(253) 278-4116
Jerry Bartlett	(206) 832-3005 Cell Phone:(206) 713-5673

QUALIFIED INDIVIDUAL:

One of the Qualified individuals must be contacted by the E,H &S department in the event of an extreme emergency for example: large fire, major spill, spill to surface water, major traffic accident.

Stephen Banchero	(206) 948-1208
Clue Westmoreland	(206) 713-5680
Jerry Bartlett	(206) 713-5673
John Brigham	(206) 715-4534

FEDERAL/ STATE

Utah Department of Environmental Quality	1-801-536-4123
U.S. Coast Guard & National Response Center	1-800-424-8802
EPA Region 8 (Emergency Response)	1-800-227-8914

CONTRACTORS PRIMARY RESPONDER FOR RELEASE TO SURFACE WATER

Foss Environmental	1-800-337-7455
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FIRE/POLICE	911
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4.5 Reporting

Within 15-days after any release of used oil that is reported under R315-15-9.1(b) of the Utah Used Oil Management Rules, Emerald Services, Inc. will submit a written report which contains the following information:

1. Emerald Services, Inc. name, address, and telephone #.
2. Date, time, location and nature of the incident
3. Chemical involved and quantity released.
4. The extent of any injuries, if occurred.
5. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
6. The estimated quantity and disposition of recovered material that resulted from the incident.



ATTACHMENT 1

SPILL REPORTING FORM

Emerald Recycling
9010 E. Marginal Way S Suite 200, Seattle, WA 98108
(206) 832-3000

Date: _____ Time of Spill : _____
Address Location of Spill: _____
Responsible Party(s): _____
Type of incident (i.e., fire, explosion, spill etc.): _____
Type of material spilled: _____
Quantity and duration of spill: _____
Quantity of recovered material that resulted from the incident: _____
Health Risk: _____
Did spill reach surface water or storm drains: _____
Description of Incident: _____

Signature of Responsible Party

Date Signed

Corrective Action Taken: _____

Agencies Contacted: _____ Report #: _____

Agency Representative/Name: _____

Action Required by Agency: _____

Management Review Signature

Date Reviewed

National Response Center/U.S.C.G.
Utah Department of Environmental Quality
EPA Region 8 (Emergency Response)
Utah State Patrol

1-800-424-8802
1-801-536-4123
1-800-227-8914
801-538-3400

ATTACHMENT 2

Critical Points to be inspected after an Earthquake.

1. Visually inspect all drums secure and stable on palates. _____
2. Check for possible leaking drums. _____
3. Visually inspect all tanks. _____
4. Visually inspect all pipeline connections _____
6. Visually inspect all piping throughout the facility. _____
7. Visually inspect all containment berms for possible cracking. _____
8. Visually inspect below ground surface impoundments for possible cracks. _____
9. Visually inspect all natural gas lines. _____
10. Check for proper operation of wastewater treatment system, boilers and oil transfer computer system. _____



Closure Plan

Last printed: 3/1/04

1. INTRODUCTION

R315-15-11

This Closure Plan specifies performance standards and describes procedures for closure of the Used Oil Transfer Facility units including all ancillary units and piping (referred to herein as "permitted units") at the Emerald Services, Inc. (Emerald) Transfer Facility located in Salt Lake City, Utah. The purpose of this Closure Plan is to describe the anticipated procedures, decontamination techniques, and schedule involved in the closure activities.

Emerald intends to close the units by removing all waste and waste residues; therefore, a Post-Closure Plan is not provided. However, if closure in accordance with the Closure Plan is not possible, the Closure Plan will be amended accordingly, and a Post-Closure Plan will be prepared and submitted for approval by the Executive Secretary prior to implementation.

2. FACILITY DESCRIPTION

2.1. Facility Function and Location

The facility is located at 650 West 500 South, Salt Lake City, Utah. The site includes one rail spot and the surrounding land zoned is for light industrial use. The facility is used as a transfer facility for transferring used oil from a bulk tanker truck to a rail car and storage of drums in a box trailer for temporary storage less than 35 days as defined in R315-15-4.

2.2. Products

Emerald will transport and transfer used oil generated in the automobile industry and other industries which generate used lubrication oil.

2.3. Emerald Permitted Units

The following sections describe the permitted units at the Emerald facility. Those units include rail cars, bulk tank trucks, box trailer and containment areas. The arrangement of those units and layout of the facility is shown in Figure 2-1, Facility Layout Diagram. The following is a description of major units at the facility.



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2.3.1 Rail Car

Bulk temporary storage of used oil for a period of less than 35 days will occur in a staged rail car.

2.3.1.1 Physical Description

The car will be staged and moved by Union Pacific Railroad. It has a capacity of 26,500 gallons and it is ~ 68' in length.

2.3.1.2 Waste Characterization

The used oil in the railcar will contain less than 1000 ppm of total halogenated organic compounds.

2.3.1.3 Maximum Inventory

The maximum inventory is one rail car containing 26,500 gallons.

2.3.2 Bulk Tanker Truck

Bulk tanker trucks will be used to pick up the used oil from various generators and transport the product to the transfer facility for transfer into the rail car. Used oil will be held in the tanker trucks for a period of less than 24hrs. Tanker trucks will also be used at times to transfer used oil that has been collected outside Utah, from rail cars to end users.

2.3.2.1 Physical Description

Tanker trucks are certified to meet 49 CFR 180.405 Subpart E Qualifications of Cargo Tanks for Transportation of Hazardous Materials, 49 CFR 180.407 Subpart E Requirements for Tests and Inspections of Specification Cargo Tanks.

2.3.2.2 Maximum Inventory

There will be no inventory of used oil stored in Tanker Trucks. All used oil will be transferred into the rail car for storage exceeding 24hrs. Only one vehicle will be performing any transfer operations at one time. Empty trucks will be parked at a secured off-site location for overnight storage.



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2.3.3 Box Trailer

Box vans will be used to pick up the used oil in non-bulk containers or totes from various generators and transport the product to the transfer facility for transfer into the box transfer trailer for storage less than 35 days.

2.3.3.1 Physical Description

Box Trailer will be used to transport used oil in non-bulk containers i.e. drums and totes.

2.3.3.2 Waste Characterization

The used oil may contain greater than 1000 ppm of total halogenated organic compounds.

2.3.3.3 Maximum Inventory

There will be a maximum of one box van being utilized for storage at any time. The size of the trailer will vary, but should be approximately 45' in length. All used oil in containers will be stored in the trailer for no more than 35 days.

3 Closure Objectives

The following describes the closure performance standard for the permitted units and site.

3.1 Closure Performance Standard

The permitted units and site will be closed in a manner that complies with the performance standards contained in R315-15-11. The objectives of the program are as follows:

- Minimize the need for further maintenance.
- Control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of used oil, used oil constituents, leachate, contaminated run-off, or used oil decomposition products to the ground, surface water, groundwater, or to the atmosphere.



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Final closure of the permitted units is intended to accomplish the goals of the closure performance standard noted above by:

- Removing and/or decontaminating all remaining containers, equipment, asphalt base, structures, soil, groundwater or other material containing or contaminated with used oil or used oil residues associated with the permitted units and site.
- Performing confirmation sampling, as necessary, to assess the removal or destruction of the used oil and used oil constituents at the permitted units and site.

3.2 Historical Constituents of Concern

Emerald has reviewed historical data to identify used oil arriving at the facility. Based upon this information, constituents of concern have been identified by evaluating underlying constituents for materials characterized as used oil. Table 3-1 (Historical Constituents of Concern in Used Oil) provides a summary of the applicable underlying constituents.

As discussed in Section 2 (Facility Description) all permitted units have held or processed the same type of used oil. Based upon this information, the constituents of concern for the permitted units are shown in Table 3-2 (Constituents of Concern in used oil). The test methods that will be used to analyze samples for constituents of concern are tabulated in Table 3-3 (Analytical Methods). The most appropriate EPA approved analytical method at the time of closure, as determined by the Executive Secretary of the Solid and Hazardous Waste Control Board, will be used.

3.3 Clean Closure Levels

All used oil, used oil residues, or equipment, bases, liners, soils, groundwater or other materials contaminated with used oil or used oil residue will be removed or decontaminated.

3.4 Contingencies for Soil

Sampling will be conducted in accordance to the site plan submitted to and approved by the Executive Secretary of the Solid and Hazardous Waste Control Board to characterize the areal and vertical extent of possible contamination at and/or released from the closing unit(s) and to confirm the effectiveness of closure activities. Knowledge of past management practices



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at Emerald will help determine the most appropriate amount and type of sampling.

4 CLOSURE ACTIVITIES

This section addresses activities that will be completed during closure of the permitted units. The following activities are described for each type of unit or system:

- Removal of used oil inventory
- Decontamination
- Confirmation of clean closure
- Contingencies
- Final disposition

Sampling and analysis activities specified in this section will be performed in accordance with Appendix A, "Sampling and Analysis Plan". Emerald Services, Inc. will submit a site-specific sampling and analysis plan to the Executive Secretary of the Solid and Hazardous Waste Control Board for approval.

The purpose of this Closure Plan is to achieve clean closure of the permitted units. No contaminated structures or equipment will remain on site.

4.1 Health and Safety

Prior to conducting any fieldwork for the implementation of this Closure Plan, a site-specific Health and Safety Plan (HASP) will be prepared in accordance with 29 *CFR* 1910.120. The HASP will describe the health and safety requirements, responsibilities, and training requirements that will apply to personnel implementing the Closure Plan. It will also describe the potential hazards present during the field work, emergency response procedures, the minimum personal protective control measures, establishment of work zones, confined space entry procedures, and decontamination procedures. The HASP will also address the requirements for ambient air monitoring by specifying the PID/FID levels at which respirators will be donned. The HASP will be made available for review by appropriate agencies.



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4.2 Removal of Used Oil Inventory

The objective is to remove all used oil and send it to a permitted processor/re-refiner (Emerald's Seattle facility). Each step is described below including general sequence, removal procedures, estimates of volume, staging and containerization of wastes, equipment used, and preparation for transportation off-site.

4.2.1 General Sequence

Emerald will remove all used oil inventory in a sequenced approach. Since all units are transportation units, all equipment will be transported from the site.

- All inventory and residual wastes will be transferred into the railcar, box trailer or tanker truck for transport.
- All transport vehicles will be sent to Emerald's Seattle facility for cleaning.
- All inventory of all PPE (personal protective equipment) or cleanup materials will be transported off-site for disposal at Emerald's Seattle facility.

The basis for determining the maximum waste inventory is described in Section 2 (Facility Description). The maximum facility inventory is as follows:

- | | |
|---------------|----------------|
| • Railcar: | 26,500 gallons |
| • Box Trailer | 4,000 gallons |

4.2.2 Final Disposition for Tank Systems

All permitted units will be removed from the facility at closure and returned to the owner.

4.2.3 Containment Decontamination

The containment equipment will be visually inspected to identify any cracks or other openings. All containment equipment will be removed from the site and transported off-site for decontamination at Emerald's Seattle facility.



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4.3 Soil and Groundwater Sampling to Demonstrate Clean Closure

Emerald will demonstrate whether soils meet closure standards by direct soil sampling and analysis. If groundwater is encountered during any excavation or sampling, groundwater will also be sampled and analyzed. Emerald will analyze all samples for Constituents of Concern as listed in Table 3-2. Emerald will conduct bias sampling for this demonstration in accordance with the remediation plan submitted to and approved by the Executive Secretary of the Solid and Hazardous Waste Control Board.

Bias sampling focuses on likely areas, including, but are not limited to:

1. any other units (such as ancillary pipes) that may be in contact with soil;
2. load or unload areas;
3. storage units with underlying pavements or asphalt that appears to be cracked, broken, heavily stained, or the site of major past repairs;
4. areas receiving runoff or discharge from used oil management units, such as a ditch, a swale, or the discharge point down gradient from a pipe; and
5. groundwater, if encountered, during any excavation or sampling.

To estimate the number of bias samples for the closure cost estimate, the number of transferring areas within used oil management areas at the facility will be counted. That number will be added to an estimate of the number of significant cracks or past repairs in concrete and spills that may have occurred over the life of the facility (e.g., five or so). That total is the number of bias samples used for the purpose of the closure cost estimate. Analyses of each sample will be conducted for a suite of analytes (e.g., VOCs, SVOCs, total metals), and the closure cost estimate reflects this amount of analysis.

4.4 Procedure in event Contamination is Detected

If contamination is detected above cleanup levels, the following steps will be taken. Emerald Services, Inc. will submit a remediation plan to the Executive



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Secretary of the Solid and Hazardous Waste Control Board for approval. The sampling plan will include, at a minimum, a description on how Emerald will:

1. Remove or remediate soil that has contamination above the cleanup levels followed by confirmation sampling to ensure clean closure standards are met.
2. Sample and analyze groundwater, if encountered, during excavation of contaminated soil, to verify compliance with clean up standard.
3. Reanalyze soils of the entire area represented by the sample that has contamination above the cleanup levels using other samples taken within the area.
4. If further contamination beyond that covered by the remediation plan is encountered in the soil or groundwater, Emerald Services, Inc. will submit an amended remediation plan for approval to the Executive Secretary of the Solid and Hazardous Waste Control Board which addresses the areas of concern.

Emerald will sample and analyze closing units for the number of samples and for the constituents as described in Appendix A.

5. CLOSURE CERTIFICATION

In accordance with R315-15-11.4 of the Utah administrative code, within 60 days, of completion of final closure, Emerald's owner must submit to the Executive Secretary, by registered mail, certification that the used oil management facility, has been closed in accordance with the specifications of the approved closure plan and the sampling and remediation plans approved by the Executive Secretary of the Solid and Hazardous Waste Control Board as part of closure. The certification must be signed by Emerald's owner and by an independent qualified registered professional engineer.

Emerald's owner must make the following certification:

I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Activities of the independent qualified registered professional engineer shall include, but not be limited to, field observation and review of records of the following:

1. Sampling procedures;
2. Locations of soil sampling and groundwater sampling, if necessary, to ensure locations sampled were as specified in the sampling and analysis plan;
3. Sample labeling and handling, including chain-of-custody procedures;
4. Tank decontamination procedures to ensure that closure plan requirements for decontamination and rinsate management were followed and tanks were adequately cleaned; and
5. Procedures to achieve a "clean debris surface" were as specified in 40 CFR § 268.45, Table 1, for metal and asphalt surfaces.

6. CLOSURE SCHEDULE

The following provides information on the time allowed for closure and provisions for any necessary time extensions.

a. Time Allowed for Closure

Closure activities will begin a maximum of 90 days after receipt of the final shipment of used oil or some other date determined by the Executive Secretary. Emerald will complete closure activities in accordance with the approved closure plan, including sampling and remediation plans approved by the Executive Secretary of the Solid and Hazardous Waste Control Board as part of closure. Emerald will submit closure certification to the Executive Secretary within 60 days following completion of closure activities and final facility closure.

7. CLOSURE COST

a. Closure Cost Estimate

The information presented in this section for implementing the Closure Plan has been prepared in accordance with R315-15-12 (6). The following assumptions were used in developing the cost estimate:

- A third party will be used to conduct closure activities.



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- The cost estimate does not incorporate any salvage value.
- Oversight and closure certification will be conducted by an independent, qualified, registered professional engineer.

Costs for transportation and disposal of used oil, including existing inventory, and contaminated wash water (rinsate) are based on contract prices and recent invoices from treatment, storage, and disposal facilities that Emerald is currently using. At the time of implementation of this Closure Plan, Emerald reserves the option to use any other appropriately permitted facility for disposal or recycling of wastes. The cost estimate for closure of permitted used oil transfer facility units at the Emerald facility is presented as Appendix B, along with a more detailed breakdown of the cost estimates.

b. Financial Assurance for Closure

Emerald Services, Incorporated will meet the financial assurance requirements specified under R315-15-12 Reclamation Surety, by continuously maintaining a financial assurance mechanism for closure with the Department of Environmental Quality. The amount of mechanism must be consistent with closure cost estimate provided in Appendix B of this Closure Plan and will be increased annually, if necessary due to inflation. Emerald must demonstrate continuous compliance by providing documentation of financial assurance, as required by R315-15-12 in at least the amount of the current cost estimate.

Appendix A

Sampling and Analysis Plan

The number of bias samples to be required is based on units 1) ancillary pipes) that may be in contact with soil, 2) load or unload areas, 3) storage units with underlying pavements or asphalt that appears to be cracked, broken, heavily stained, or the site of major past repairs, 4) areas receiving runoff or discharge from used oil management units, such as a ditch, a swale, or the discharge point down gradient from a pipe.5) groundwater that maybe encountered during any excavation.

Table A-1. Estimated Sampling and Analysis of Closing Units

Transfer Facility Area	Area, (ft ²)	Estimated number of biased samples (aver. 1/294 ft ²)
Load/Unload Area	472.5	1
Railcar Area	588.5	1
Railcar Supplemental Containment Area	64	1
Area under Box Trailer	540	1
Containment under Tank Truck	100	1
Groundwater, if necessary		1

Appendix B

Closure Cost Estimate

Activity	Qty	Units	Previous Year Unit Cost	IPD Unit Cost Adjustm ent*	Adj'd Unit Cost	Total Costs
<u>Prepare HASP</u>	1	document	\$1000.00	\$67.66	\$1067.66	\$1067.66
Used Oil Inventory Removal						
<u>Tank Storage (Rail car, Box Van and Tank Trucks)</u>						
Inventory Removal	24	Hours	\$31.22	\$0.68	\$31.89	\$765.36
Activities (labor)						
Supervisor	2.4	Hours	\$78.04	\$1.69	\$79.73	\$191.35
(10% of activity labor)						
Transportation and Recycling (Offsite)	30,500	Gallons	\$0.07	\$0.01	\$0.08	\$2440.00
Subtotal						\$3396.71
<u>Tank System</u>						
<u>Decontamination</u>						
Rinsate	5000	Gallons	0.15	0.02	0.17	\$850.00
Transportation /Disposal						
Decontamination	10	Hours	\$31.22	\$0.68	\$31.89	\$318.90
Activities						
Supervisor	1	Hours	\$78.04	\$1.69	\$79.73	\$79.73
(10% of activity labor)						
Subtotal						\$1,248.63
<u>Asphalt/Soil Core</u>						
<u>Verification</u>						
Sampling (labor)	8	Hours	\$31.22	\$0.68	\$31.89	\$255.12
Supervisor	0.8	Hours	\$78.04	\$1.69	\$79.73	\$63.78
Equipment Rental	2	Day	\$104.05	\$2.26	\$106.31	\$212.62
Laboratory Analysis	12	Sample	\$336.00	\$14.66	\$350.66	\$4207.92
Subtotal						\$4739.44
<u>Asphalt/Soil Removal</u>						
Removal (labor)	8	Hours	\$31.22	\$0.68	\$31.89	\$255.12
Equipment (rental)	1	Day	\$104.05	\$2.26	\$106.31	\$106.31
Supervisor	.8	Hours	\$78.03	\$1.69	\$79.72	\$63.77
Transportation/ Disposal	20	Yd3	\$205.68	\$4.46	\$210.13	\$4,202.60
Subtotal						\$4,627.80
<u>P.E. and Certification</u>						\$2,000.00
Subtotal						\$16,840.24
10% Contingency						\$1,684.02
Adjustment for 2003 inflation rate						\$190.71
Total						\$18,954.97

Appendix C

Figures

Appendix D

Tables

Table 2-1 Storage System Physical Description			
Storage Unit	Tank Identification	Maximum Capacity (gal)	Unit Description
<i>Rail Car</i>	Rail Car	26,500	68' rail car
<i>Box Van</i>	Various	4,000	Non-bulk container storage

Table 2-2
Secondary Containment Areas

Secondary Containment Area	Management Practice
Railcar Area	Bulk loading
Railcar Supplemental Containment Area	Bulk loading
Box Van Containment Area	Non-bulk Storage
Tank Truck Unloading Containment Area	Tank Truck containment used during off-loading

Table 2-3
Secondary Containment Design Data

Secondary Containment Area	Area (ft²)	Dimensions	Height (inches)
Load /Unload Area (Total Containment Area)	825.5		
A. Railcar Area	121.5	13.5' x 9'	6"
B. Railcar Supplemental Containment Area	64	8' x 8'	6"
C. Tank Truck Containment	100	10'x10'	
D. Box Van Containment	540	54' x 10'	1'

Table 3-1 Historical Constituents of Concern in Used Oil		
Waste Material	Constituent of Concern	CAS Number
Used oil	N/A	N/A
D004	Arsenic (As)	7440-38-2
D006	Cadmium (Cd)	7440-43-9
D007	Chromium (Cr)	7440-47-3
D008	Lead (Pb)	7439-92-1
Toxic Organics		
D018	Benzene	71-43-2
D039	Tetrachloroethylene	127-18-4
D040	Trichloroethylene	79-01-6
Petroleum Hydrocarbons		
TRPH	Total Petroleum Hydrocarbons	N/A

Table 3-2
Constituents of Concern

<i>Volatile Organics</i>
1,1,1-Trichloroethane
Benzene
Ethylbenzene
Perchloroethylene (Tetrachloroethene)
Tetrachloroethylene
Toluene (methylbenzene)
Trichloroethylene
Xylenes (mixed isomers)
<i>Petroleum Hydrocarbons</i>
Total Petroleum Hydrocarbons
<i>Total Metals</i>
Arsenic
Cadmium
Chromium (total)
Lead

**Table 3-3
Analytical Methods**

Target Analyte¹	Analytical Technique	SW-846²
Volatile Organics (VOC)	GC/MS for volatile organics	8260
Total Petroleum Hydrocarbons (TPH)	Hexane Extractable Media	1664
Metals (total)	Total metals by ICP	6010
Note: 1. These methods (or ASTM equivalent) will be used as needed to identify constituents of concern or waste characteristics. 2. The most recent (or equivalent) analytical method will be utilized.		

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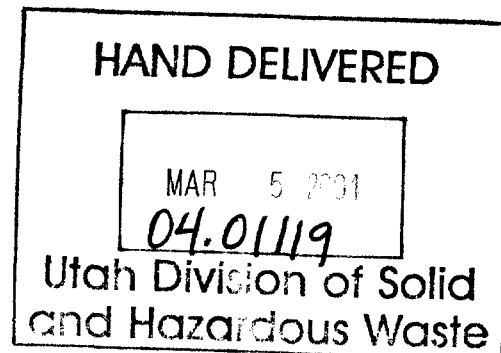
UP GREG HARREL SLC

P.01/01

January 27, 2004



Jim Minnell
Emerald Petroleum Services



Dear Jim:

This is official notice to Emerald Petroleum, of the need to re-locate your transload operation, currently taking place off Warm Spring Road, to a new location at 450 South 700 West in what we call our 4th South Yard. The new track location will be Yard 05 track 796.

This re-location is taking place to better serve your needs in regards to frequency of switching and truck safety. With the main track currently serving Warm Springs Road soon to become an even more busy track to serve a future Intermodal facility west of Salt Lake, it became necessary to make this move. At this location, we will be better able to give you more frequent switches which will in turn get your product to your receivers in the PNW in a timelier manner.

Please advise when Emerald would be able to facilitate this change.

Sincerely,

A handwritten signature in dark ink, appearing to be "BD".

Bill Denkers

MAIL THE COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM			
1. Reason for Submittal (See instructions on page 23) MARK CORRECT BOX(ES)	Reason for Submittal: <input checked="" type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). <input type="checkbox"/> As a component of the Hazardous Waste Report.			
2. Site EPA ID Number (See instructions on page 24)	EPA ID Number: _____			
3. Site Name (See instructions on page 24)	Name: <u>Emerald Services, Inc</u>			
4. Site Location Information (See instructions on page 24)	Street Address: <u>450 South 700 West</u>			
	City, Town, or Village: <u>Salt Lake City</u>		State: <u>UT</u>	
	County Name: <u>Salt Lake County</u>		Zip Code: <u>84104</u>	
5. Site Land Type (See instructions on page 24)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
6. North American Industry Classification System (NAICS) Code(s) for the Site (See instructions on page 24)	A. <u>56211</u>		C. _____	
	B. _____		D. _____	
7. Site Mailing Address (See instructions on page 25)	Street or P. O. Box: <u>1725 West 1500 South</u>			
	City, Town, or Village: <u>Salt Lake City</u>			
	State: <u>UT</u>			
	Country: <u>Salt Lake County</u>		Zip Code: <u>84104</u>	
8. Site Contact Person (See instructions on page 25)	First Name: <u>Napo</u>		MI: _____ Last Name: <u>Jennings</u>	
	Phone Number: <u>801-973-4131</u>		Phone Number Extension: _____	
9. Legal Owner and Operator of the Site (See instructions on pages 25 to 26)	A. Name of Site's Legal Owner: <u>Union Pacific RR</u>		Date Became Owner (mm/dd/yyyy): _____	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
	B. Name of Site's Operator: <u>Emerald Services, Inc</u>		Date Became Operator (mm/dd/yyyy): _____	
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			

EPA ID No.

10. Type of Regulated Waste Activity (Mark the appropriate boxes for activities that apply to your site. See instructions on pages 26 to 30)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste

(Choose only one of the following three categories.)

- ☐ a. LOG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- ☒ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities. (Mark all that apply)

- ☐ d. United States Importer of Hazardous Waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, mark all that apply.

- ☒ 2. Transporter of Hazardous Waste
- ☐ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- ☐ 4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
5. Exempt Boiler and/or Industrial Furnace
- ☐ a. Small Quantity On site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption
- ☐ 6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (Mark all boxes that apply):

	Generate	Accumulate
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Mark all boxes that apply.)

1. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- ☒ a. Transporter
- ☒ b. Transfer Facility
2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 31)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

HP LASERJET 3150
PRINTER/FAX/COPIER/SCANNER

SEND CONFIRMATION REPORT FOR
EMERALD SERVICES
206 832 3220
DEC-29-03 12:17PM

JOB	START TIME	USAGE	PHONE NUMBER/ADDRESS	TYPE	PAGES	MODE	STATUS
835	12/29 12:16PM	1'14"	801 538 6715	SEND.....	4/ 4	EC144	COMPLETED.....
TOTAL		1'14"	PAGES SENT: 4		PAGES PRINTED: 0		



Fax Cover Sheet

DATE: 12/29/03 TIME: _____

TOTAL PAGES: 4
(INCLUDING COVER SHEET)

ATTENTION: Delene Stevenson FAX #: 801-538-6715

COMPANY: UT DEQ PHONE: _____

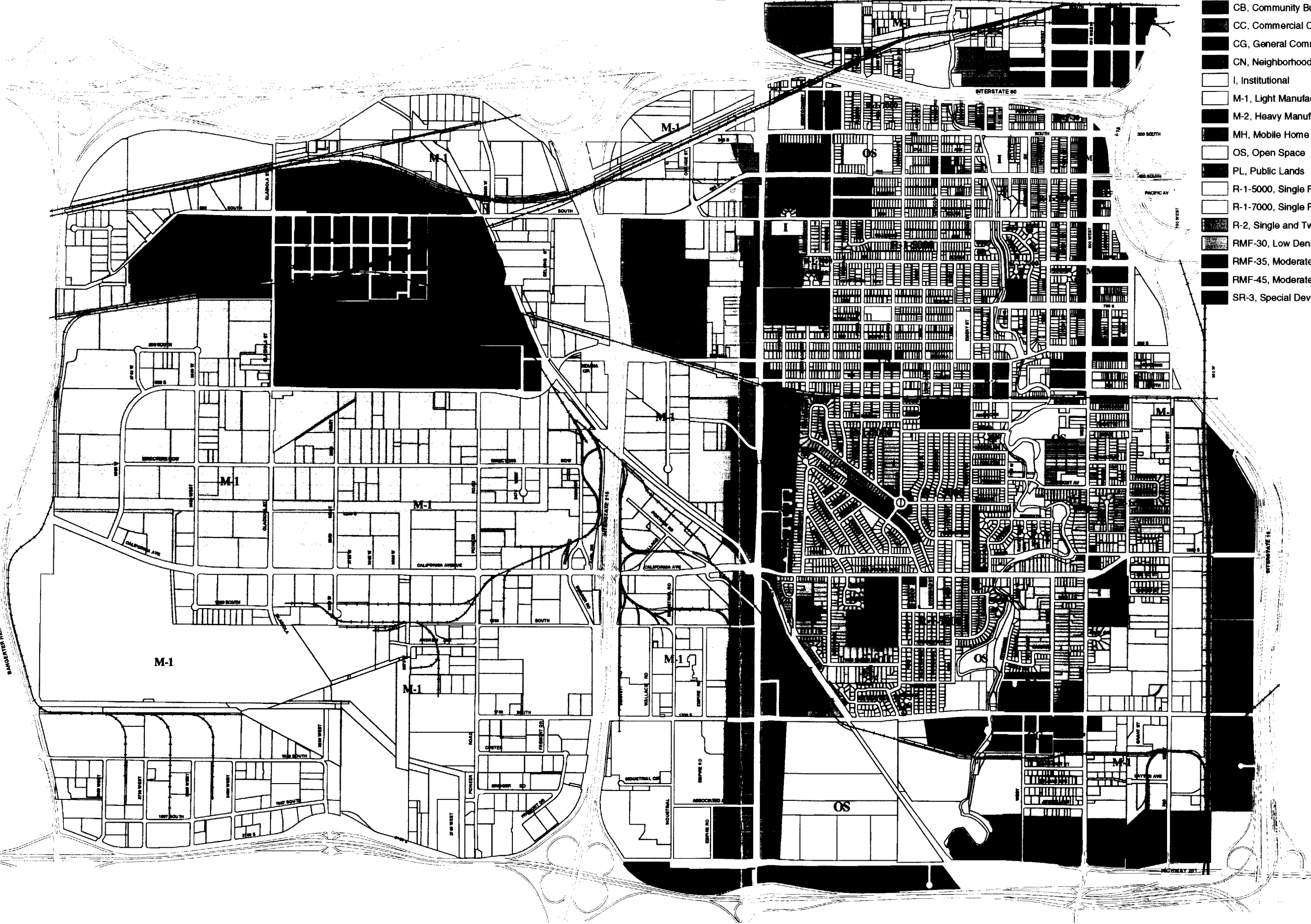
RE: Notice of Hazardous Waste activity

FROM: Stacy Fox PHONE: 206-832-3035 FAX: 206-832-3220

MESSAGE

TACOMA FACILITY
1825 ALEXANDER AVE
TACOMA, WA 98421

West Salt Lake Zoning Map



Map Legend

- Transitional Overlay District
- BP, Business Park
- CB, Community Business
- CC, Commercial Corridor
- CG, General Commercial
- CN, Neighborhood Commercial
- I, Institutional
- M-1, Light Manufacturing
- M-2, Heavy Manufacturing
- MH, Mobile Home Park
- OS, Open Space
- PL, Public Lands
- R-1-5000, Single Family Residential
- R-1-7000, Single Family Residential
- R-2, Single and Two-Family Residential
- RMF-30, Low Density Multifamily Residential
- RMF-35, Moderate Density Multifamily Residential
- RMF-45, Moderate/High Density Multifamily Residential
- SR-3, Special Development Pattern Residential

